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15 *Attorneys for Plaintiffs in AFGE v. Office of*
16 *Management and Budget, Case No. 3:25-cv-08302-VC*

17 *[Additional counsel and affiliations listed on signature page]*

18 UNITED STATES DISTRICT COURT
19
20 FOR THE NORTHERN DISTRICT OF CALIFORNIA
21
22 SAN FRANCISCO DIVISION

23 AMERICAN FEDERATION OF
24 GOVERNMENT EMPLOYEES, AFL-CIO, et
25 al.

26 Plaintiffs,
27 v.

28 DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF STACEY M.
LEYTON IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER CASES SHOULD
BE RELATED (CIVIL L.R. 3-12)**

1 I, Stacey M. Leyton, declare as follows:

2 1. I am an attorney representing Plaintiffs in *American Federation of Government*
3 *Employees, AFL-CIO, et al. v. United States Office of Management and Budget, et al.*, Case No. 3:25-
4 cv-08302-VC (*AFGE II*), and am a partner at the law firm of Altshuler Berzon LLP. I am a member
5 in good standing of the bars of the State of California and this Court. I make this declaration based
6 on my personal knowledge and, if called to testify, could and would testify as stated herein.

7 2. Shortly after filing the complaint in *AFGE II*, I sent an e-mailed copy to the U.S.
8 Attorney for the Northern District of California, Craig Missakian, copying Civil Chief Pamela
9 Johann, and asked whether they would accept service of the complaint and whether they could
10 provide Defendants' position on whether the two cases should be related. At the time of this filing, I
11 have not received any response.

12 3. I also contacted counsel for the defendants in this case, *American Federation of*
13 *Government Employees, AFL-CIO, et al. v. Donald J. Trump, et al.*, Case No. 3:25-cv-03698-SI
14 (*AFGE I*), to ask whether they could provide their position on whether the two cases should be
15 related. Counsel for defendants in *AFGE I* responded that they oppose relating the two cases.

16 4. Because the rules require Plaintiffs to promptly provide the Court notice of a related
17 case, we are proceeding to file the Administrative Motion to Consider Whether Cases Should Be
18 Related.

19
20 I declare under penalty of perjury under the laws of the United States that the foregoing is true
21 and correct. Executed on September 30, 2025, in San Francisco, California.

22
23 /s/ Stacey M. Leyton
24 Stacey M. Leyton